

IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

OCT - 9 2020

RICK WARREN
COURT CLERK

CJ-2020-4823

CASE NO:

The Honorable Judge _____

AMBER VERA,

Plaintiff,

v.

AMY DERKS, and STAR FLEET
TRUCKING, INC.

Defendants.

PETITION

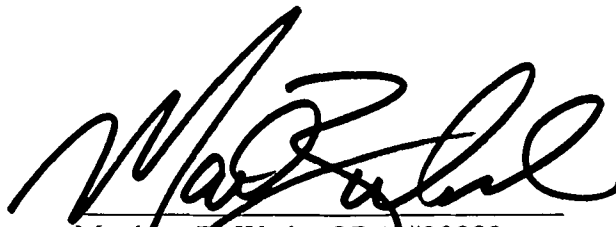
COMES NOW Plaintiff, Amber Vera, by and through counsel, the Abel Law Firm, and in support of their personal injury causes of action states:

1. On March 13, 2019, Plaintiff, was operating her vehicle southbound near the 1200 block of Garth Brooks Boulevard in Canadian County when the Defendant, Amy Derks (hereafter "Derks"), negligently operated her vehicle and collided with the Plaintiff's vehicle.
2. Defendant Star Fleet Trucking, Inc. (hereafter "Star") is a Foreign For Profit Business Corporation incorporated in the State of Delaware.
3. At all times mentioned herein, Defendant Derks was acting as the agent, servant and employee and within the course and scope of her agency/employment with Defendant Star.
4. As a result of the negligence of the Defendant Derks, Plaintiff suffered injuries and incurred medical expenses.
5. Plaintiff's injuries resulted from Defendants' negligence as follows:
 - a. Defendant Derks was inattentive to the roadway,
 - b. Defendant Derks made in improper and illegal left turn,

- c. Defendant Derks did not operate her vehicle in a safe and reasonable manner,
- d. Defendant Derks failed to maintain proper control over her vehicle at a time when Defendant Derks knew (or should have known) that without such control, persons, including Plaintiffs, were likely to be injured.
- e. Defendant Star furnished a vehicle to Defendant Derks at a time when Defendant Star knew, or should have known, Defendant Derks was not a safe, careful or competent driver and that as a result thereof, persons, including Plaintiff, were likely to be injured.
- f. Defendant Star negligently hired, screened, retained, trained and/or instructed Defendant Derks with regard to the operation of its vehicle.

6. As a result of Defendants' negligence, Plaintiff suffered personal injuries. Said injuries may be permanent, painful and progressive. As a further result of said injuries, Plaintiff has and will incur medical expense, has and will lose earnings, has and will suffer pain of mind and body, may be permanently disabled, and have been damaged in an amount in excess of \$75,000.00.

WHEREFORE, Plaintiffs pray judgment against Defendants in an amount in excess of \$75,000.00, together with interest and costs of this action.

A large, stylized handwritten signature in black ink, appearing to read 'Matthew B. Wade', is written over a horizontal line.

Matthew B. Wade, OBA #20883
ABEL LAW FIRM
900 NE 63rd Street
Oklahoma City, OK 73105
(405) 239 7046/Fax (405) 418 0833
mwade@abellawfirm.com
ATTORNEYS FOR PLAINTIFF

ATTORNEY LIEN CLAIMED